

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ORIGINAL

UNITED STATES OF AMERICA :

- v. - :

CORNELIO CAZAREZ MADRID, :

a/k/a "Ave Felix,"

HERNAN CAZAREZ MADRID, :

a/k/a "Alfredo," and

SINOHE ANTONIO ARAUJO MEZA, :

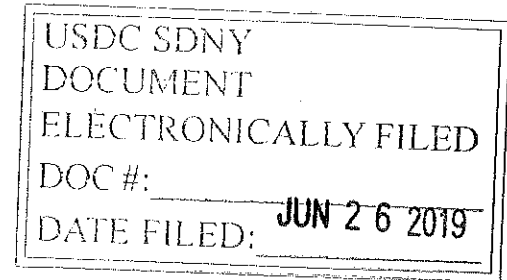
a/k/a "Carrera,"

Defendants.

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SUPERSEDING INDICTMENT

S4 16 Cr. 680 (GHW)



COUNT ONE

The Grand Jury charges:

1. From at least in or about 2013, up to and including in or about 2016, in the Southern District of New York, Mexico, and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular State or district of the United States, CORNELIO CAZAREZ MADRID, a/k/a "Ave Felix," HERNAN CAZAREZ MADRID, a/k/a "Alfredo," and SINOHE ANTONIO ARAUJO MEZA, a/k/a "Carrera," the defendants, at least one of whom has been arrested in and first brought to the Southern District of New York, and whose point of entry into the United States was in the Southern District of New York, and others known and unknown, knowingly and intentionally combined,

conspired, confederated, and agreed together and with each other to violate the narcotics laws of the United States.

2. It was a part and object of the conspiracy that CORNELIO CAZAREZ MADRID, a/k/a "Ave Felix," HERNAN CAZAREZ MADRID, a/k/a "Alfredo," and SINOHE ANTONIO ARAUJO MEZA, a/k/a "Carrera," the defendants, and others known and unknown, would and did knowingly and intentionally import into the United States and into the customs territory of the United States from a place outside thereof controlled substances, in violation of Title 21, United States Code, Sections 952(a) and 960(a)(1).

3. It was further a part and object of the conspiracy that CORNELIO CAZAREZ MADRID, a/k/a "Ave Felix," HERNAN CAZAREZ MADRID, a/k/a "Alfredo," and SINOHE ANTONIO ARAUJO MEZA, a/k/a "Carrera," the defendants, and others known and unknown, would and did manufacture, distribute, and possess with intent to distribute controlled substances, intending, knowing, and having reasonable cause to believe that such substances would be unlawfully imported into the United States and into waters within a distance of 12 miles of the coast of the United States from a place outside thereof, in violation of Title 21, United States Code, Sections 959(a) and 960(a)(3).

4. The controlled substances that CORNELIO CAZAREZ MADRID, a/k/a "Ave Felix," HERNAN CAZAREZ MADRID, a/k/a "Alfredo," and SINOHE ANTONIO ARAUJO MEZA, a/k/a "Carrera," the

defendants, conspired to (a) import into the United States and into the customs territory of the United States from a place outside thereof, and (b) manufacture, distribute, and possess with intent to distribute, intending and knowing that such substances would be unlawfully imported into the United States and into waters within a distance of 12 miles of the coast of the United States from a place outside thereof, were (i) one kilogram and more of mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 960(b)(1)(A); (ii) five kilograms and more of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 960(b)(1)(B); (and (iii) 500 grams and more of mixtures and substances containing a detectable amount of methamphetamine, in violation of Title 21, United States Code, Section 960(b)(1)(H). (Title 21, United States Code, Sections 952(a), 959(a), 959(d), and 963; Title 18, United States Code, Section 3238.)

COUNT TWO

The Grand Jury further charges:

5. From at least in or about 2013, up to and including in or about 2016, in the Southern District of New York and elsewhere, CORNELIO CAZAREZ MADRID, a/k/a "Ave Felix," HERNAN CAZAREZ MADRID, a/k/a "Alfredo," and SINOHE ANTONIO ARAUJO MEZA, a/k/a "Carrera," the defendants, and others known

and unknown, knowingly and intentionally combined, conspired, confederated, and agreed together and with each other to violate the narcotics laws of the United States.

6. It was a part and an object of the conspiracy that CORNELIO CAZAREZ MADRID, a/k/a "Ave Felix," HERNAN CAZAREZ MADRID, a/k/a "Alfredo," and SINOHE ANTONIO ARAUJO MEZA, a/k/a "Carrera," the defendants and others known and unknown, would and did knowingly and intentionally distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

7. The controlled substances that CORNELIO CAZAREZ MADRID, a/k/a "Ave Felix," HERNAN CAZAREZ MADRID, a/k/a "Alfredo," and SINOHE ANTONIO ARAUJO MEZA, a/k/a "Carrera," the defendants conspired to distribute and possess with intent to distribute were (a) one kilogram and more of mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(A); (b) five kilograms and more of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(A); and (c) 500 grams and more of mixtures and substances containing a detectable amount of methamphetamine, in violation of Title 21, United States Code, Section 841(b)(1)(A).

(Title 21, United States Code, Section 846.)

FORFEITURE ALLEGATION

8. As a result of committing the controlled substance offenses charged in Counts One and Two of this Indictment, CORNELIO CAZAREZ MADRID, a/k/a "Ave Felix," HERNAN CAZAREZ MADRID, a/k/a "Alfredo," and SINOHE ANTONIO ARAUJO MEZA, a/k/a "Carrera," the defendants, shall forfeit to the United States, pursuant to Title 21, United States Code, Sections 853 and 970, any and all property constituting or derived from any proceeds the defendants obtained directly or indirectly as a result of the offenses and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the offenses charged in Counts One or Two of this Indictment.

Substitute Assets Provision

9. If any of the above-described forfeitable property, as a result of any act or omission of CORNELIO CAZAREZ MADRID, a/k/a "Ave Felix," HERNAN CAZAREZ MADRID, a/k/a "Alfredo," and SINOHE ANTONIO ARAUJO MEZA, a/k/a "Carrera," a/k/a "Apache," the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of

the Court;

d. has been substantially diminished in value;

or

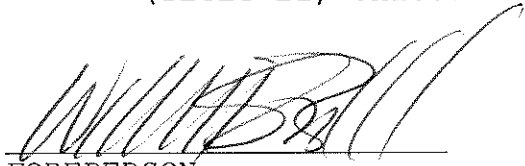
e. has been commingled with other property

which cannot be subdivided without

difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Sections 853(p) and 970, to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 21, United States Code, Sections 853 & 970.)


FOREPERSON


GEOFFREY S. BERMAN
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

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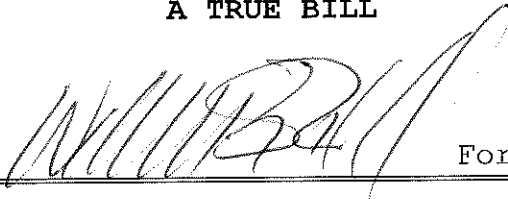
SUPERSEDING INDICTMENT

(21 U.S.C. §§ 846, 959(c) & 963; and
18 U.S.C. § 3238.)

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GEOFFREY S. BERMAN
United States Attorney.

A TRUE BILL



Foreperson.

*Superseding Indictment
USMJ Sarah Netbunn
6/26/19*